

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 7
YEP COMMERCE, INC., <sup>1</sup>	:	Case No. 23-11820-LSS
Debtor.	:	
	:	Hearing Date: October 8, 2024 at 11:00 a.m.
	:	Objections Due: September 30, 2024 at 4:00 p.m.

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**NOTICE OF CHAPTER 7 TRUSTEE'S MOTION FOR AN ORDER AUTHORIZING  
THE PUBLIC AUCTION AND SALE OF THE DEBTOR'S RIGHT, TITLE, AND  
INTEREST IN CERTAIN VEHICLES, FREE AND CLEAR OF ALL LIENS,  
CLAIMS, INTERESTS, AND ENCUMBRANCES, PURSUANT TO 11 U.S.C. §§ 105 AND  
363, AND RULE 6004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

TO: THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; COUNSEL FOR THE DEBTOR; CREDITORS THAT HOLD CLAIMS FOR WHICH PROOFS OF CLAIM HAVE BEEN FILED; ALL CREDITORS IDENTIFIED ON THE CREDITORS' MATRIX; AND THOSE PERSONS WHO HAVE REQUESTED NOTICE PURSUANT TO BANKRUPTCY RULE 2002

**PLEASE TAKE NOTICE** that Alfred T. Giuliano, the Chapter 7 trustee (the “Trustee”) for the estate of Yep Commerce, Inc. (the “Debtor”), has filed a motion seeking the entry of an Order, pursuant to 11 U.S.C. §§ 105 and 363, and Fed. R. Bankr. P. 6004, requesting entry of an Order authorizing (i) the Trustee to sell the Debtor’s right, title, and interest in the Vehicles (as defined in the Motion) by online public auction (the “Auction”) conducted by Taylor & Martin, LLC Auctioneers (the “Auctioneer” or “T&M”); and (ii) the sale (the “Sale”, and together with the Auction, the “Auction and Sale”) of the Vehicles to the highest prevailing bidder at the Auction, free and clear of liens, claims, interests, and encumbrances, with any such liens, claims, interests, and encumbrances attaching to the proceeds from the Auction and Sale to the same extent, validity, and priority, as existed prior to the Auction and Sale (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that if you seek to object or otherwise respond to the Motion, you must file a response/objection to the Motion on or before September 30, 2024 at 4:00 p.m. ET in writing, with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, DE 19899-2323. If a copy of the Motion is not enclosed, you may obtain it by sending a written request to the Trustee’s proposed counsel at the address listed below.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response/objection upon the Trustee’s proposed counsel:

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<sup>1</sup> The last four digits of the Debtor’s Employer Identification Number are 1962.

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**A HEARING IS SCHEDULED FOR OCTOBER 8, 2024 AT 11:00 A.M. ET.**

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

**FOX ROTHSCHILD LLP**

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*Attorneys for Alfred T. Giuliano, Chapter 7 Trustee for  
the estate of Yep Commerce, Inc.*

Dated: September 16, 2024